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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 22-0036 CRB
Plaintiff,)	
v.)	DECLARATION OF TRIAL ATTORNEY S. BABU
)	KAZA IN SUPPORT OF UNITED STATES'
JULI MAZI,)	OPPOSITION TO DEFENDANT'S MOTION TO
Defendant.)	WITHDRAW GUILTY PLEA
)	
)	

I, S. Babu Kaza, declare as follows:

1. I am a Trial Attorney with the Criminal Division, Fraud Section. I am assigned to the prosecution of the above-referenced case. I make this declaration in support of United States' Opposition to Defendant's Motion for Withdrawal of Guilty Plea.

2. The defendant engaged in two complex proffer sessions with the prosecution, wherein she fully explained her scheme to fabricate fake vaccination cards, and identified records and receipts

1 relevant to the offense. The first proffer session occurred on October 27, 2021, and was approximately
2 two hours in length. The second proffer session was on April 6, 2022, and was approximately one hour
3 in length. The defendant did not display or express any indications of coercion or lack of mental
4 responsibility.

5 3. The defendant, through her counsel, made specific efforts to communicate to the
6 prosecution that she was devoting an extensive number of hours to gather evidence of her criminal
7 conduct. Specifically, on or about January 20, 2022, the defendant communicated that she had spent 72
8 hours reviewing customer records and receipts, and preparing a spreadsheet of her data. On April 5,
9 2022, the defendant indicated that, pursuant to a request from the prosecution, she spent 6 hours
10 compiling email communications between herself and her office manager.

11 I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 18th day
12 of July 2022.

13 /s/ S. Babu Kaza
14 S. BABU KAZA
15 Trial Attorney
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